

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
) Criminal No: 21-CR-10173-PBS
)
)
v.)
)
ANDRE TILAHUN,)
)
Defendant.)

GOVERNMENT'S MOTION
TO REOPEN ISSUE OF RESTITUTION

Now comes the United States and respectfully requests that the Court re-open the issue of Restitution and modify the judgment in this case to allow for an award of \$3,000 to an additional victim ("██████████"). The defendant assents to this motion.

On January 18, 2023, the Court sentenced the defendant and deferred restitution for 90 days. ECF No. 94. On April 12, 2023, the parties filed a joint motion for an order of restitution, and on April 14, 2023, the Court granted the order. ECF Nos. 100, 102, and 103.

On April 17, 2023 an attorney for the additional victim contacted the government for the first time. The attorney provided the government with a victim impact statement and a report detailing losses/costs. Attached as Exhibit 1. The government then conferred with defense counsel. The additional victim and defense counsel agreed to an award of \$3,000 in restitution.

The government moves for the Court to modify the restitution judgment accordingly. The government states that there is no prejudice in such a modification at this point where the Court made it clear at sentencing that it intended to entertain argument on the appropriateness of any restitution amount and the defendant has just begun his six-year sentence. *See Dolan v. United*

5/26/23
Approved
Pamela